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To: [Gorin, Jonathan](#)
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Subject: LCP Monthly Progress Report, July 2013
Date: Monday, August 05, 2013 10:27:03 AM
Attachments: [L080513JG\(0713\)ProgRep.pdf](#)

Good morning Jon.

On behalf of IES, attached is the monthly progress report for the LCP Chemicals, Inc. Superfund site. Paper copies will be sent via US Mail.

Please contact either John Hoffman of Ashland Inc. or me, should you have questions or comments.

Thank you

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VIA E-MAIL AND US MAIL

August 5, 2013

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: Monthly Progress Report for July 2013
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Continued preparation of a revised final *Remedial Investigation Report* (RIR), based on final input from the USEPA on the response to the Agency's comments. A redline version of the RIR was submitted to the Agency in early July, to facilitate the final review process.
- A redline version of the *Draft-Final Baseline Ecological Risk Assessment* (Appendix Q to the RIR) was submitted to the USEPA in April, and completion of this portion of the RI is pending USEPA final approval.
- Continued coordination with the USEPA on the *Draft Feasibility Study* (FS), following the meeting with the National Remedy Review Board (NRRB).

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated July 5, 2013, including an updated project schedule dated July 2, 2013.

- An electronic mail message from Scott MacMillin of Brown and Caldwell to Jon Gorin of the USEPA, transmitting a redline version of the RIR and a comment tracking table that shows how comments from the USEPA from 2009 to the present have been resolved.
- C. The following agency approvals were received during the previous month:
 - None during the reporting period.
- D. The following agency documents and correspondences were received during the previous month:
 - An electronic mail message from Jon Gorin of the USEPA to John Hoffman of Ashland, Carrie McGowan of EHS-Support, and Gary DiPippo of Cornerstone, dated July 18, 2013, documenting discussion during a conference call on that date and additional comments on the RI and FS resulting from the NRRB review.
- E. Other pertinent communications with the agencies during the previous month:
 - None during the reporting period.

2. Future Actions, Data, and Plans

- A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's final approval of the revised RIR, BERA, and FS reports:
 - Submit the final *Remedial Investigation Report* for USEPA approval.
 - Submit the final *Baseline Ecological Risk Assessment* for USEPA approval.
 - Submit a redline version of the final FS report to the USEPA to facilitate review, and following the USEPA's review submit the final *Feasibility Study Report* for USEPA approval.
 - Continue work to properly dispose of the tank that moved during Hurricane Sandy.
- B. Other information related to the progress of work:
 - None during this reporting period.

3. Project Schedule

- A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process. Based on USEPA's input regarding the schedule for finalizing the RI, BERA, and FS reports, the schedule remains unchanged from the previous progress report. As the time necessary to

complete the review process and prepare final RI and FS documents is further defined, the schedule will be updated accordingly.

B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- No specific delays are being encountered at this time, and the current schedule reflects the continuation of coordination with the USEPA to finalize the draft RI and FS reports.

C. Description of efforts made to mitigate these delays or anticipated delays:

- None necessary at this time.

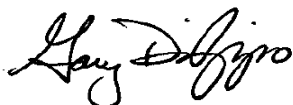
4. Funding Mechanism

A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3233.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC



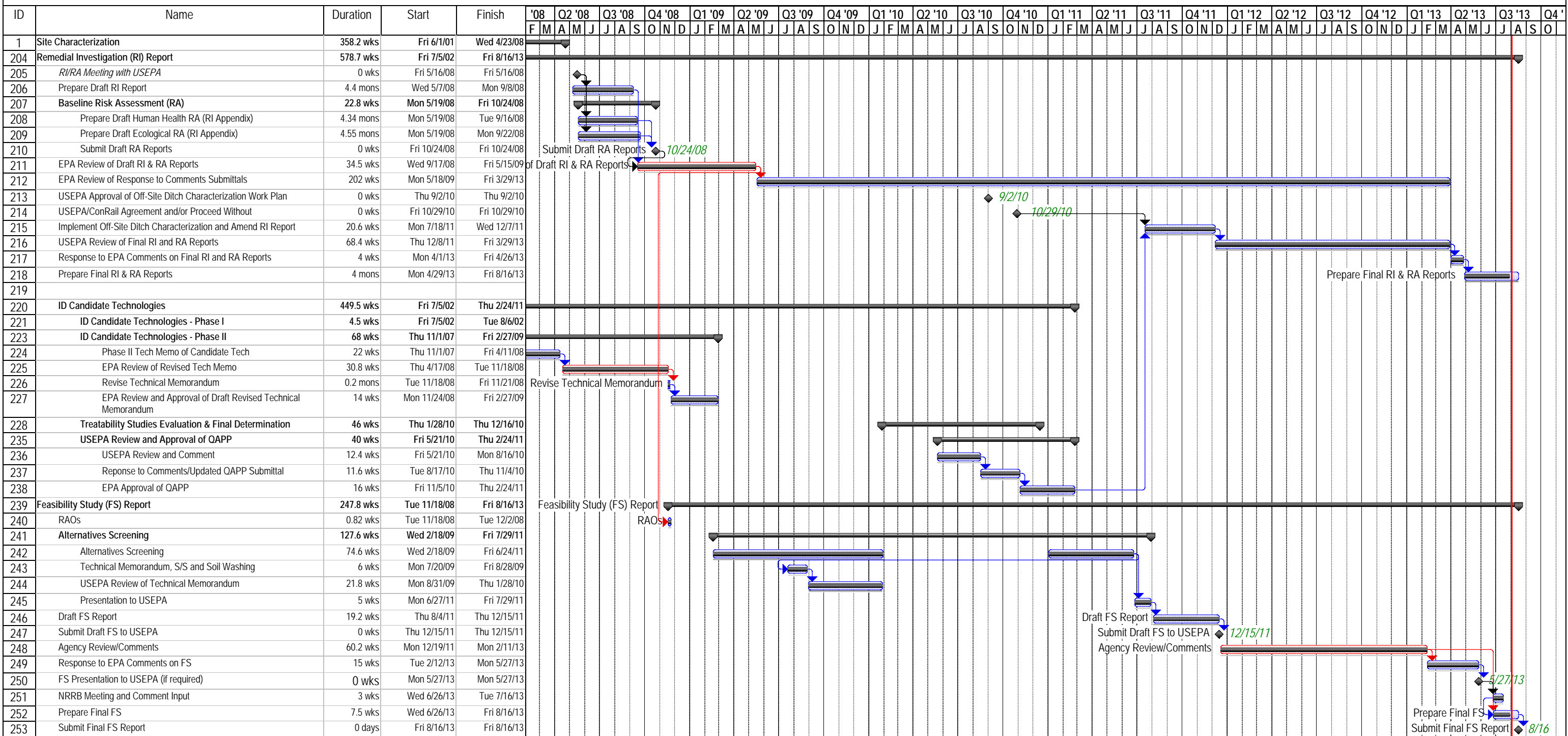
Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.
S. Miller, NJDHSS
F. Cardiello, Esq., USEPA
D. Toft, Esq.
A. Pavelka, NJDEP
R. Lampkin, Ashland

C. McGowan, EHS Support
S. MacMillin, Brown and Caldwell
K. Tolson, Geosyntec
M. DeFlaun, Geosyntec
J. Kubitz, Entrix

Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site



Task Progress Milestone Summary